

Mark S. Scheffer, Id. No. 59271
Law Offices of Mark S. Scheffer
P.O. Box 111
Birchrunville, PA 19421
(610) 915-8351

Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANCIS J. SOLITARIO

: CIVIL ACTION

v.

: NO.

RICHARDS APEX, INC.

: JURY TRIAL DEMANDED

COMPLAINT

1. Plaintiff, Francis J. Solitario, a citizen of the United States of America residing therein at 131 W. Gravers LN, Philadelphia, PA 19118.

2. Defendant, Richards Apex, Inc., was Plaintiff's former employer and conducts business in the Commonwealth of Pennsylvania, with offices located at 4202-24 Main Street, Philadelphia, PA 19127-1698.

3. The cause of action set forth in this complaint arises under the Age Discrimination in Employment Act of 1967 ("ADEA"), as amended, 29 U.S.C. §621 *et seq.*, and under the Pennsylvania Human Relations Act, ("PHRA"), as amended, 43 P.S. § 951 *et seq.*

4. The District Court has jurisdiction over this action pursuant to 28 U.S.C. §§1331 and 1337.